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Mediations & Arbitrations

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September 29, 2022

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**In re: 4:22-cv-03279, Lewis Brisbois, *et al* v. Bitgood, *et al*;
In the United States District Court, Southern
District of Texas**

Dear Mr. Fisher:

In a civilized society, we do not address anyone by their first name unless they have been specifically invited to do so. I say this because if we were "friends," as you put it, you would have called "Sue" long in advance of suing me, my indigent client, and my colleagues in federal court. Having said the above, I read Mr. Bitgood/Easton's letter to all of you yesterday, offering to submit this dispute to the federal court based on stipulated facts. I concur with him, and agree that we should not be wasting the Court's time.

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In state court, the court found that the so-called law firm in which you are a partner, had no legal authority to appear in a Texas Court from March 9, 2022, and the Secretary of State concurred that your law firm was not granted an assumed name until June 9, 2022.

This sequence begs this question, and will be discovered in due time in federal court: In how many other Texas courts were you people doing business illegally—before those judges and magistrates, clients, and your opponents find out that your firm had no legal authority to be in a Texas court in the first place? I can only imagine what is going to happen when that comes out in federal court where you chose to initiate hostile litigation against me and “Michael” and my client.

Had you people hired a professional and independent law firm to evaluate the false claims you bring in the federal petition, the first thing I surmise that would have crossed their minds is:

“What will this do to the clients that you have already harmed when the federal courts find out that they were stealing from the CARES Act; systematically targeting tenants of color; and using a corrupt police officer as their enforcer?”

These are questions that would have loomed large—at least in my mind—before I would have filed a federal lawsuit. Now, you compound that harm by exposing the client, Nolan Real Estate Services, yet again to severe criminal sanctions, as well as a permanent ban from receiving any federal monies in the future.

And why do you do this? I surmise that ego and pride have been the sole factors that have been behind your revenge-driven lawsuit. **This alone should be enough to convince anyone that we are not, and have never represented ourselves to be associated with Lewis Brisbois—the California Foreign entity—that puts their pride and arrogance above the interests of the client.**

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Nothing we did in forming the domestic Texas LLP was illegal, underhanded, unethical, hidden, shady, or done to deceive. In fact, the state court has already said so, and removed you and your firm from the state court case and struck your client's pleadings for having committed a crime in using by using an illegal name to appear in state court, as well as having the audacity to present falsehoods to the court. **Again, based on that alone, no one should be confused as to who we are, and as to who you guys are. We are simply not that incompetent, and we do not harm anyone, as the domestic LLP was not formed to practice law as you complain of. Rather, it was formed to help others settle disputes and curtail litigation in favor of ADR.** Thus, you may rest assured that we want no part of you, or of the reputation that you are creating for yourselves on the national legal stage. I also find your incredibly strained reading of Rule 7.01 which you enclose and reference in your letter, to be as on point as David Oubre's performance of his legal "skill" as we all witnessed on September 13, 2022, in the state court.

Nowhere in our domestic LLP's letterhead do we claim or even represent to anyone that we are lawyers practicing law under that trade name. That I am a licensed attorney at law, is a title I am granted by the Texas Supreme Court, not by the Secretary of State, nor by any authority in the State of California. Further, I am fully aware that forming a partnership for the practice of law with a non-lawyer like Michael, would be illegal on its face; subject me to State Bar discipline; and to rebuke by the Courts as well. **Given all these undisputable facts, I think that you are trying to set the stage to "gaslight" the federal courts into not believing what they see, but rather, into believing what you say.**

No one copied, touched, or attempted to touch or take your trademark "LB," as our "trademark" is one that is available to anyone in Texas: namely the Texas flag, and the "Gonzales Canon" which makes your filing in federal court not only malicious, but extremely false and misleading.

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We want no association with the incompetence of your law firm; we do not practice law under our LLP; we deny as hard as we can that we have anything to do with the shame and disgrace and exposure that your firm has brought to its own clients. In short and given your firm's sophomoric behavior, no one in Texas will confuse us with you or the California foreign LLP that was ejected from the Texas state court.

If you want to dismiss your federal case before we answer you can do that. If you want to have a meaningful and intelligent discussion, we can do that, as well. However, continued threats and falsehoods, along with threats to grieve me will not be well received.

Finally, let me say this: your firm's suing an indigent Black man for no reason at all, speaks volumes as well that NO ONE will ever confuse you with us, or us with you. We try to help people, not harm them, and everything we do is legal and aboveboard. I hope going forward that your firm will display the proper candor to the federal courts, and that you and Ms. Lubert will cease with the threats. Given what has transpired to date, and as long as federal litigation is pending, I concur and insist that all our communications be exclusively in writing.

Cordially,

/s/ Susan C. Norman

Susan C. Norman

\SCN

cc: Michael Easton
Bradley B. Beers, Esq.
Ms. Jana Lubert, Esq.
William S. Helfand, Esq.

PS: In what you might believe as being a clever move, you have sent an overnight letter addressed to the "Law Offices" of Susan Norman at the LLP's mailing address. That letter will be returned as that address has never been my address for the practice of law—thus dashing your last hope to uncover any circumstantial "evidence" of professional misconduct on my part, right?